

Lines 4555-4556 should be deleted and replaced with the: "Lance et al. (In press) concluded that marbled murrelets are not recovering. Thus, both PWS-wide population surveys and productivity surveys indicate that the marbled murrelet population is in decline."

We also recommend emphasizing the potential problems with corvids, which tend to increase where human activity increases. We suggest adding the following to the marbled murrelet section: "Corvids (jays, magpies, crows) appear to be the main predators of eggs and nestlings, and they thrive in fragmented habitats and where human food or refuse attracts and increases their numbers. This is one problem that might be manageable, possibly through placement of recreational facilities, education, enforcement, and other practices."

Page 3-199, lines 4650-4654 We suggest changing to wording to reflect that these are dominant habitats of Townsend's warblers, not that they are the most abundant breeding bird found here. Also, add this sentence: "The highest densities of Townsend's warblers (birds/route) in the Alaska Breeding Bird Survey are recorded on routes on the eastern Kenai Peninsula (B.A. Andres, FWS, pers. comm.)."

Page 3-201, Sensitive Species As stated in our comment about Table 3-45, we recommend adding Tule greater white-fronted goose and Kittlitz's and marbled murrelets to this section. We believe it is important to recognize that PWS supports relatively high densities of two important species, Kittlitz's and marbled murrelet, which are rare and/or endangered elsewhere. Both of these species appear to be experiencing population declines in PWS. The marbled murrelet is especially sensitive to upland management prescriptions, and the Kittlitz's murrelet is sensitive to activities in the glacially-influenced intertidal/nearshore areas.

Page 3-201, Line 4738 The Final EIS should clarify the intent of the sentence that ends with "...constitutes the powers a viability concern."

Page 3-207, Table 3-49 Under conservation options for marbled murrelet, the citation "Kulitz" is misspelled and should read (Kuletz 1998).

Page 3-208, Table 3-50 We recommend adding "wolf" to the list of species in "early forest succession" under "Kenai Peninsula." We also recommend adding Tule greater white-fronted goose, Kittlitz's murrelet, and an indicator shorebird species to this table.

Page 3-209, Table 3-51 Since it is possible that marine transfer facilities and docks could occur within sheltered inshore waters, we recommend that you add these two items under the Sheltered Inshore Waters category. Potential risks to wildlife also include impacts caused by marine recreation, such as motor boats, kayaks, and wildlife/glacier tour boats. We also recommend a section be added to this table in the Final EIS to help evaluate risk factors to wildlife from these activities. The section could be titled "marine recreation/tourism cruises" and would have 'x's under tidal estuarine, rocky coast, beach association, and sheltered inshore waters.

Page 3-210, line 4962 Change "seabirds" to "waterbirds."

Page 3-210, Paragraph 5 We agree with the recommendation to apply seasonal restrictions and buffer zones in areas where high concentrations of black oystercatchers nest. We look forward to further research and coordination between the FWS and USFS to help define buffer sizes and determine distribution of high concentration black oystercatcher nesting areas.

Page 3-221, Line 5244 The wolf was not reintroduced to the Kenai Peninsula. Wolves were extirpated by the 1920's by poison and bounties, and wolves naturally recolonized in the late 1950's - early 1960's, when predator control programs stopped. We suggest this be corrected.

Page 3-223, Marbled Murrelet, Lines 5293-5299 The population estimate should be changed to ~ 53,000 in line 5293. Fragmentation of forests from roads, development, and harvest should be included in line 5294 as an additional risk to marbled murrelet habitat. In line 5299 the Final EIS should define "old-growth" before concluding only 1% of marbled murrelet nesting habitat would be impacted under Alternative A. The range of 'old-growth' types is large in PWS, and most of it is sub-optimal at best for marbled murrelet. Since marbled murrelets use a specific type of old-growth, this alternative probably impacts much more than 1%. We suggest consulting with USFS Ecologist Rob Develice to arrive at a more realistic estimate, based on his model of marbled murrelet nesting habitat in PWS. Also, proximity to good feeding areas would make some forest stands very important, so even if the total impacted area is small, the impact to the marbled murrelet population could be significant. This should be discussed in the Final EIS. In productivity studies conducted by Kuletz (2000), high-quality nesting habitat was a significant predictor of high marbled murrelet productivity. Because productivity for this species varies considerably among regions of PWS, the importance of high quality habitat areas is critical and such areas should not be lumped with large tracts of low-quality old-growth.

Page 3-239, Line 5908, Effects on wildlife from transportation and utility corridors Information should be provided in the Final EIS on the lethal effects to birds from electrocutions and collisions with power lines.

Page 3-392, Line 690-91 The Final EIS should clarify that there was some limited exploration for copper deposits in the CNF during the early to mid-1970s (Jansons and others, 1984). More recently, on private (Native) lands within CNF, there has been some evaluation of copper and other deposits (Kodosky and Teller, 1989, and Chugach Alaska Corporation, 1999). Presently copper deposits are being promoted for joint venture options by the land owners.

Page 3-392, line 695 The Final EIS should clarify that increased activity in the area is not necessarily restricted to placer gold deposits. All potential deposit types and unrecognized resources could receive increased attention if metal prices rise (Nelson and Miller, 1999).

Page 3-395, line 808 The Final EIS should state that copper production included minor amounts of lead and zinc, as well as precious metals, such as gold and silver.

Page 3-395, line 813, Table 3-93: Mineral production and reserves on CNF A reference is needed in the Final EIS for the values presented in this Table. In addition, we suggest the figures reported be more clearly discussed in the text. Under "Placer Gold" for both "Past Production" and "Current Production," the reported numbers are given in ounces and yet the reserves are

reported as 22,750,000 cubic yards. An agreement of units is needed in the Final EIS. The number for "Reserves" is incorrect and should read 11,750,000 cubic yards of gold-bearing gravels. No grade is available. Under "Load Gold, Reserves," it is important to note that the average grade of the ore is not available. Under "Base Metal, Reserves," the number "greater than 7,246,000" should show that this is tons of ore with the average grade of 2% copper.

Page 3-398, line 940: Potential Foreseeable Development The reference should read Steve Nelson (not Melson), USGS contract (not USFS contract).

Page 3-406, line 1185, Cumulative Effects There is a published evaluation (Goldfarb and others, 1996) that discusses the impact of copper mining on acid mine drainage. If any of the old copper deposits go back into production or new ones are developed, acid mine drainage would be of concern. This should be elaborated upon in the Final EIS.

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FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D.C. 20426

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2000 NOV 20 PM 4: 23

Dave Gibbons  
Chugach National Forest  
3301 C Street, Suite 300  
Anchorage, AK 99503

Dear Mr. Gibbons:

Thank you for your letter dated September 15, 2000, providing the Commission with a copy of the Proposed Revised Chugach National Forest Land and Resource Management Plan (Plan), including the Draft Environmental Impact Statement (EIS).

Based on staff review, the following document qualifies as a comprehensive plan under Section 10(a)(2)(A) of the Federal Power Act (FPA):

Forest Service. Proposed Revised Chugach National Forest Land and Resource Management Plan. Department of Agriculture, Anchorage, Alaska. Undated.

The Plan is supported by the Forest Service's Draft EIS for the Chugach National Forest.

Any future river-related plans prepared by the Chugach National Forest must be filed with the Commission in order to be considered in the Commission's FPA Section 10(a)(2)(A) analysis of hydropower projects in Alaska.

Sincerely,

*Edward Abrams*

Edward Abrams  
Leader  
Hydro East Group 2

cc: Public Files



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

January 5, 2001

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Reply To  
Attn Of: ECO-088

Ref:97-024-AFS

Dave Gibbons  
Forest Supervisor  
Chugach National Forest  
3301 C Street, Suite 300  
Anchorage, Alaska 99503

Dear Mr. Gibbons

We have reviewed the **Proposed Revised Land and Resource Management Plan and Draft Environmental Impact Statement (EIS) for the Chugach National Forest** (CEQ Number 000320) in accordance with our responsibilities under the National Environmental Policy Act and §309 of the Clean Air Act. The proposed plan and draft EIS present and analyze eight (8) alternatives, including No Action, currently under consideration by the Forest Service for managing the resources within the Chugach National Forest in Alaska.

Based on our review, we have assigned a rating of EC-2 (Environmental Concerns-Insufficient Information) to the proposed revised Land and Resource Management Plan (revised Plan) and draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we used in our evaluation of this revised Plan and draft EIS is enclosed for your reference.

Overall, we believe that the Management Area Prescriptions contained in the proposed revised Plan provide a reasonable balance of the uses of the Forest. We believe that this general framework for the management of the Chugach is a direct reflection of the inclusive, consensus-driven process that the Forest Service has used during the development of the revised Plan. We commend you for developing the Plan in such an open manner. We also applaud the planning team's innovative use of information technology (particularly the CD-ROM and the internet web site) as planning and communication tools.

While we are generally comfortable with the direction being proposed in the revised Plan, we believe that Plan should be strengthened in the following manner:

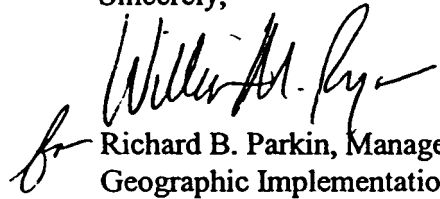
1. Clarify how the Plan will ultimately conform with the recently revised Forest Service planning rule;
2. Clarify and strengthen the direction of the proposed Standards and Guidelines (S&Gs); and
3. Revise and refine the monitoring plan to better address the goals, objectives and S&Gs of the Plan.

In addition, we recommend the effects analyses in the draft EIS be revised to include sufficient information to support the conclusions related to expected effects from management activities on the Forest.

Enclosed please find our detailed comments, which elaborate further on these issues. We are interested in working closely with the Forest Service in resolving the issues we have identified above and in our enclosed comments. I urge you to contact Bill Ryan of my staff at your earliest opportunity to discuss our comments and how they might best be addressed for the proposed plan. Bill can be reached at (206) 553-8561.

Thank you for the opportunity to review this proposed Plan/draft EIS.

Sincerely,

  
Richard B. Parkin, Manager  
Geographic Implementation Unit

Enclosures

cc: K. Hanley, Alaska DEC  
R. Blazer, Alaska DGC

**EPA Comments on the  
Proposed Revised Land and Resource Management Plan for the Chugach  
National Forest  
and Draft Environmental Impact Statement**

**COMMENTS ON THE PROPOSED REVISED FOREST PLAN**

Overall, we believe that the Management Area Prescriptions contained in the proposed revised Land and Resource Management Plan (revised Plan) provide a reasonable balance of the uses of the Forest. We believe that this general framework for the management of the Chugach National Forest (CNF) is a direct reflection of the inclusive, consensus-driven process that the Forest Service has used during the development of the revised Plan. We commend you for developing the Plan in such an open manner.

While we are generally comfortable with the direction being proposed in the revised Plan, we believe that the Plan should be strengthened by 1) clarifying how the Plan will ultimately conform with the recently revised Forest Service planning rule, 2) clarifying and strengthening the direction of the proposed Standards and Guidelines (S&Gs), and 3) revising and refining the monitoring plan to better address the goals, objectives and S&Gs of the Plan. These topics are discussed below.

**Relationship of Plan Direction to Direction Contained in the November 9, 2000 National Forest System Land and Resource Management Planning Rule**

The revision process for the proposed Chugach Land and Resource Management Plan was initiated prior to the release of the revised Forest Planning rule and as a consequence, development of the proposed revision can be completed under the provisions of the 1982 planning regulations or adjustments to the process can be made to conform with the new planning rule (see 36 CFR 219.35). Because the proposed revised Plan and draft Environmental Impact Statement (EIS) were released before issuance of the final planning rule, we believe that it is extremely important that the Plan and the EIS include a discussion of which version of the planning rule is being followed for this revision, along with the rationale for that decision. This is particularly important because the new rule requires that site-specific decisions made after November 9, 2003 must conform with the provisions of the new planning rule (see 40 CFR 219.35(d)). We suggest that the Plan also include a discussion of how any changes to the Plan would be made to ensure compliance with the new rule, specifically with regard to decisions to be made after November 9, 2003.

**Standards and Guidelines**

We are pleased to see that the proposed Plan clearly distinguishes between a standard (signifying mandatory application) and a guideline (signifying discretionary application). We believe that in clearly differentiating between a standard and a guideline, those charged with implementing the Plan (and those trying to understand how the Plan has been implemented) will know which elements of the Plan are mandatory (i.e., standards) and which are discretionary (i.e., guidelines).

We think that this approach will result in more consistent implementation of the Plan-directed actions during project planning efforts.

We view the Forestwide and the Management Area Standards and Guidelines (S&Gs) contained in the proposed Plan as the mitigation measures for the potential impacts of activities on the Chugach and find that the presently proposed S&Gs lack clear direction to those who would be implementing the Plan. In general, we are concerned with the wording of many of the standards and guidelines contained in the Plan in that they are unclear, do not appear to provide meaningful direction, and/or provide a high degree of flexibility during implementation with no apparent accounting system to track the outcomes (expected or otherwise). Additionally, we were unable to determine why, in some cases, there are no standards to be followed related to the protection of a given resource. We understand that S&Gs need to be able to accommodate unique situations where a standardized approach is not applicable or ultimately unworkable, but we also believe that S&Gs need to be clear and provide sufficient structure and direction to ensure that they are applied consistently across the entire Forest and that deviations are more the exception than the norm. These general concerns are reflected more specifically below in our comments on specific S&Gs. We recommend that you review all of the proposed S&Gs from the context of making them clearer and more specific.

#### **Forestwide Standards and Guidelines**

##### **Air Quality**

As presently written, the proposed standard directs CNF employees to obey the law (in this case, a limited subset of the Clean Air Act). This appears to be inconsistent with Principle #1 (on page 2-6), which states that the Forest Service is governed by existing laws, regulations and policies and that such direction is not repeated in this Plan. It also appears to be inconsistent with the introductory paragraph on Forestwide S&Gs (on page 2-7), which states: "Only specific measures to the Chugach National Forest are included. Laws, regulations and policies that apply to the National Forest System are not reiterated in the standards and guidelines."

Instead of including direction that is already required by law, we recommend that this standard be revised to include specific direction to be followed to meet Forest goals and objectives of the proposed Plan. We assume that the CNF intends to take preventive action to protect air quality on the Chugach and, consequently, we believe that the proposed Plan should contain more specific direction than the proposed standard.

We recommend that some of the information contained in the draft EIS be modified and incorporated into the Plan as Forestwide standards (or guidelines), as follows:

*Evaluate and comment on draft or proposed air quality permits as to potential adverse effects on sensitive receptors in recommended or designated Wilderness areas.*

*Implement the cooperative agreement between the State of Alaska and the Forest Service regarding prescribed burning. An Alaska Department of Environmental Conservation*

*permit is required for prescribed burns greater than 40 acres.*

*Evaluate the impact of road dust on air quality related values for projects where it is determined to be an air quality issue. Mitigation measures may include, but are not limited to, type of surface, daily time use restrictions, road closures, and the use of dust abatement products or road watering.*

Also, we suggest adding an objective for air quality (e.g., “Maintain air quality related values including public health and visibility.”) in Chapter 2, under Ecological Sustainability, Goal 1.

### Soils

We are concerned that no mandatory actions would be required prior to undertaking activities on unstable slopes. As presently written, the Plan suggests (as a guideline) that proposed activities should be evaluated with respect to the potential for mass wasting on steep slopes (greater than 72 percent). There is no direction provided related to the results of such analyses.

The proposed guideline for mass wasting appears to be based on a resource assessment by Doug Swanston. However, we believe that this guideline oversimplifies and misinterprets the findings and recommendations of that assessment. Although Swanston asserts that slope gradient is one of the most important factors in predicting mass soil movement, he does not contend that it is the only important factor. Other important factors in Swanston’s proposed Mass Movement Index include: slope shape, slope length, drainage density, soil drainage class, soil depth, parent material, and soil texture.

Because of the risks of mass wasting associated with ground-disturbing activities on unstable slopes (and their associated negative environmental effects), we recommend that the proposed Plan include a *standard* related to mass wasting and suggest the following wording for such a standard:

*No ground-disturbing activities shall be allowed on slopes with a Mass Movement Index rating of 4 (MMI4, per Swanston), unless a site-specific analysis is conducted that demonstrates that the Ecological Sustainability objectives of the Plan would still be met while conducting such activities on these slopes.*

We are concerned with the weak direction provided in the Plan with respect to the protection of riparian landforms. The protection of riparian areas is critical to maintaining fish habitat and water quality and the presently proposed guideline is not clear as to what must be done to ensure that the Plan objectives related to fish habitat and water quality would be met. We are also concerned that the proposed guideline would provide less resource protection than the minimum requirements of 36 CFR 219.27(e), which reads as follows:

“(e) Riparian areas. Special attention shall be given to land and vegetation for approximately 100 feet from the edges of all perennial streams, lakes, and other bodies of water. This area shall correspond to at least the recognizable area dominated by the riparian vegetation. No

management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment shall be permitted within these areas which seriously and adversely affect water conditions or fish habitat. Topography, vegetation type, soil, climatic conditions, management objectives, and other factors shall be considered in determining what management practices may be performed within these areas or the constraints to be placed upon their performance.”

It is our understanding that CNF intends to implement the riparian direction contained in the Aquatic Ecosystems Handbook (Handbook), which is substantially similar to the riparian direction contained in the revised Tongass Land Management Plan (TLMP). We also understand that the Handbook is still in draft form. If the Handbook is completed before the Chugach Plan is revised, and the revised Plan incorporates the Handbook by reference, then this would address EPA’s concern about the general lack of specific riparian direction in the proposed Plan. However, if the Plan is revised before the Handbook is completed, and the Plan does not include more specific riparian direction (i.e., substantially similar to TLMP, although perhaps with less emphasis on timber harvest and more emphasis on other activities such as recreation and mining), then EPA’s concerns will remain.

We recommend that the proposed guideline be revised to include mandatory protections of riparian areas in the form of a Forestwide *standard*, as follows:

*Implement the riparian direction contained in the Aquatic Ecosystems Handbook and the Soil and Water Handbook, as amended.*

#### Fisheries and Water

Standard 1. provides the direction to “reference the Aquatic Ecosystem Handbook, as amended for riparian direction and fish passage direction.” It is not clear whether the intent of this standard is to merely refer to the Aquatic Ecosystems Handbook during project planning, or to implement the direction contained in the Handbook during project planning and implementation. We recommend that the standard be rewritten as follows:

*Implement the direction for riparian areas and fish passage contained in the Aquatic Ecosystems Handbook, as amended.*

We recommend that Standard 5. be revised to read:

*Implement the Best Management Practices (BMPs) specified in the Soil and Water Handbook, as amended.*

#### Silviculture

Guideline 1. includes Table 2-2 which identifies “...minimum requirements for snag and woody debris retention...” It is not clear how minimum requirements would be consistently met if the direction to meet them is discretionary (i.e., a guideline). We recommend that the Plan include

direction to meet “minimum requirements” in the form of a Forestwide standard.

### **Monitoring and Evaluation**

We view the Monitoring and Evaluation Plan in Chapter 4 to be a critically important element of the proposed Plan. A monitoring and evaluation program designed to provide the necessary feedback on the successes (and failures) of management practices specified in the Plan and implemented on-the-ground is the cornerstone of a successful adaptive management strategy. We have concerns that the proposed Monitoring and Evaluation Plan does not provide sufficient detail or direction to ensure consistent and useful feedback with respect to the management goals, objectives, and direction presented in the Plan. Our major concerns with the proposed monitoring plan are highlighted below.

It is difficult to discern a clear monitoring and evaluation strategy that would provide feedback on the successes (or failures) in achieving the overall goals and objectives of the proposed Plan. The monitoring plan, as reflected in Table 4-1, does not appear to be well integrated with the goals, objectives, and direction of the proposed Plan. We recommend that each component of the monitoring and evaluation plan be clearly associated with the goals, objectives, standards and/or guidelines that they are intended to be measuring. This could be accomplished by including a column in Table 4-1 that lists the Plan goals, objectives, or direction that the monitoring effort is intended to address.

2. The monitoring plan identifies, in very general terms, the type of information that would be gathered with no indication of what would be done with that information. We believe it is essential that the monitoring and evaluation plan not only identify the type of information to be collected, but also indicate what actions would be taken with the information gathered (How will data and information be analyzed? What actions might follow such analyses?). Without specifying how collected data and information will be used, we are concerned that the proposed monitoring activities would not be effectively integrated into the adaptive management strategy being proposed by the Forest Service.
3. We believe that the monitoring plan does not contain the following fundamental “details” that we see as being essential for it to be an effective tool in the implementation of an adaptive management strategy.
  - a. Many of the monitoring items indicate that sampling will be done annually for a “representative sample” of activities. How will these “representative samples” be selected? How are they to be distributed throughout the Forest? We believe that for the monitoring plan to be effective, it should either present the method to be used to determine the activities to be monitored, or indicate to the users of the Plan where such direction can be found.
  - b. What monitoring methods will be used? In general, the monitoring method we are most familiar with are implemented using Standard Operating Procedures (SOPs) which outline how things are to be done in a consistent, repeatable manner. Without SOPs, monitoring approaches could be applied haphazardly across the Chugach with



the concomitant inconsistent reporting of the findings from that monitoring. Does the Forest Service have SOPs for the various monitoring activities identified in the proposed Plan? If so, the monitoring plan should identify them explicitly by citation. If not, we believe they should be developed and either be included in the Plan, or identified as being available by reference.

- c. How will results be reported? While the proposed Plan identifies general time-frames that results would be reported and by whom, we believe that the Plan should also identify the intended recipients of any monitoring reports and how the reports would relate to evaluating the relative successes and failures of Plan implementation. We believe that the Monitoring and Evaluation Plan should indicate that more will be done with monitoring data gathered than merely including them in an annual report.

We recommend that the Monitoring and Evaluation Program include a provision that would link project-specific monitoring efforts with Forest Plan monitoring, evaluation and reporting efforts. The introductory discussion in Chapter 4, which indicates that monitoring and evaluation takes place at various planning levels on the Forest, is confusing in that it is not clear how (or if) the results of these various efforts would be viewed collectively in terms of evaluating the implementation, effectiveness, or validity of the Plan. Our experience on other Forests is that project-specific monitoring and Forest Plan monitoring are often treated as distinctly different efforts with little or no relationship to each other. In many cases, project-specific monitoring provides meaningful feedback on the implementation, effectiveness, and/or validity of the direction in the Plan. As such, we believe that these findings should be integrated into the larger context of the Forest Plan monitoring and evaluation process.

## **COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Throughout the discussions of effects in the draft EIS, there are numerous statements that conclude that impacts from activities would be insignificant, minimized or mitigated by applying protective measures or Best Management Practices (BMPs). We are concerned that these conclusions, as presented, are not supported with any analyses of the effectiveness of the undefined “measures.” We recommend that the effects analyses in the EIS be revised to include sufficient information to support the conclusions being reached. Where reliance on practices that are currently in use on the Forest serve as the basis for these conclusions, the discussions should include a summary of the findings of Forest Plan and project-specific monitoring efforts that demonstrate the effectiveness of the measures in reducing or eliminating activity-related impacts.

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO -- Lack of Objections**

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC -- Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO -- Environmental Objections**

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU -- Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 -- Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 -- Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 -- Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

# FAX TRANSMITTAL

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Comments:

If you received this FAX in error, please immediately notify the sender by telephone, and return this FAX to the sender at the above address. Thank you.

STATE OF ALASKA COMMENTS  
ON THE  
CHUGACH NATIONAL FOREST PLAN REVISION  
AND  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
DECEMBER 14, 2000

The Office of the Governor, Division of Governmental Coordination has coordinated the State's review of your Draft Environmental Impact Statement and Proposed Land and Resource Management Plan (Plan) for the Chugach National Forest. This constitutes the comments of the State of Alaska and the Alaska Departments of Fish and Game (DFG), Natural Resources (DNR), Environmental Conservation (DEC), and Community and Economic Development (CED).

The State of Alaska remains committed to the forest planning process and an ongoing collaboration in Chugach Forest adaptive management. The State would like to commend the Forest Service on the collaborative and consensus-based approach used in crafting the broad range of alternatives and in developing the proposed revised Plan. While we may not agree with every part of this plan, the State believes the Forest Service is doing a good job of engaging Alaskans to seek fair compromises in finding solutions to Chugach issues.

In order to be successful, the FS must collaboratively monitor the success or failure of these compromises and adjust the Plan accordingly, on an ongoing basis, in an integrated effort with State of Alaska, Alaskan stakeholders, and local communities in an adaptive management framework. This is essential to integrate management of challenges across different land ownerships and to resolve key issues such as snow machine/non-motorized user conflicts appurtenant to the Kenai Peninsula road system, Brown bear habitat protection and management, and coordination of State, Federal, and private recreation infrastructure and management into the future.

The State commits to working with the FS, Alaska stakeholders, other agencies, and communities to articulate an integrated sustainable recreation vision for the Chugach/Kenai/PWS ecosystem to avoid the cumulative impacts of piecemeal management on this critical area.